

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ST. LOUIS LABOR HEALTHCARE NETWORK,)
an employee benefit plan,)

Plaintiffs,)

v.)

Case No. 4:17cv1917 DDN

LOUIS MAULL COMPANY)

Defendant.)

AMENDED STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Plaintiffs St. Louis Labor Healthcare Network, et al. ("Plaintiffs") and defendant Louis Maull Company ("Defendant") hereby enter into this Amended Stipulation for Entry of Consent Judgment in the amount of \$68,458.88 on the following terms:

1. Judgment is entered in favor of Plaintiffs in the amount of \$68,458.88, consisting of \$55,927.40 in contributions, \$9,262.28 in liquidated damages, \$1,655.70 in interest, \$400 in court costs and \$1,213.50 in attorney fees.

2. Further legal proceedings to collect on the above judgment shall be stayed, contingent upon Defendant's compliance with the following requirements:

a. Defendant shall make payments on the judgment according to the following schedule:

- i. \$10,000.00 by July 27, 2017;
- ii. \$4,000.00 by August 3, 2017;
- iii. \$4,000.00 by August 10, 2017;
- iv. \$4,000.00 by August 17, 2017;
- v. \$4,000.00 by August 24, 2017;

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- vi. \$4,000.00 by August 31, 2017;
- vii. \$4,000 by September 7, 2017;
- viii. \$6,000 by September 14, 2017;
- ix. \$6,000 by September 21, 2017;
- x. \$6,000 by September 28, 2017;
- xi. \$6,000 by October 5, 2017;
- xii. \$6,000 by October 12, 2017;
- xiii. \$6,000 by October 19, 2017;
- xiv. The balance (\$222.88) by October 26, 2017.

b. Defendant shall timely submit all reports and payments to Labor Healthcare Network required under the terms of its collective bargaining agreement with Teamsters Local 688 during the pendency of the above payment schedule.

3. If Defendant fails to comply with Paragraph 2 above, the entire judgment amount, less amounts paid, shall become immediately due, and Plaintiffs shall be entitled to proceed with further legal action, including execution on the judgment balance.

4. Additionally, such default, as described in Paragraph 3 above, shall entitle Plaintiffs to interest at the maximum lawful rate on the judgment balance from the date of execution of this Stipulation for Entry of Consent Judgment through the date of such default, as well as interest at the maximum lawful rate on any subsequent delinquencies of Defendant; furthermore, such default shall entitle Plaintiffs to their reasonable attorneys' fees both to this point and subsequently incurred in collecting the judgment balance, as well as their court costs;

5. In the event that Plaintiffs learn that additional amounts are owed through an accounting or pay stubs showing an unreported bargaining unit employee, Plaintiffs shall be entitled to seek collection of such additional amounts.

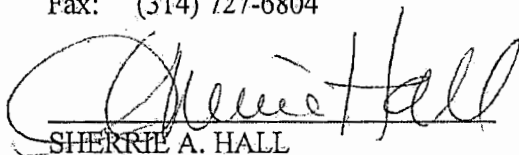
6. All payments herein shall be made payable to Labor Healthcare Network and sent by first class mail to the following address of Plaintiffs' counsel, unless Defendant is otherwise notified in writing by Plaintiffs:

Sherrie Hall
Hammond and Shinnars, P.C.
7730 Carondelet, Suite 200
St. Louis, MO 63105

7. Within five days following satisfaction of this Stipulation by Defendant, Plaintiffs will dismiss this matter without prejudice.

8. This Stipulation for Consent Judgment will not be filed with the Court unless Defendant fails to comply with the terms herein and fails to cure its non-compliance within three business days of notice of said failure.

HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
Phone: (314) 727-1015
Fax: (314) 727-6804


SHERRIE A. HALL

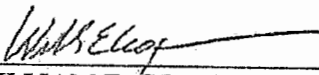
Attorneys for Plaintiffs


UNITED STATES DISTRICT JUDGE
MAGISTRATE

Date: Sept. 25, 2017

SO ORDERED:

LAW OFFICE OF WILLIAM E. COOPER
9909 Clayton Rd., Ste. 227
St. Louis, Mo 63124
Phone: (314) 581-4091
Fax: (314) 667-3763



WILLIAM E. COOPER

Attorney for Defendant.